

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

TAMMARAWA WRIGHT LEVERETT,
Debtor.

CHAPTER 13
CASE NO. 11-58196-MAR
JUDGE MARK A RANDON

**TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO ALLOW ENTRY OF ORDER
AUTHORIZING THE TRUSTEE TO PAY LATE-FILED CLAIMS FILED BY THE
MICHIGAN DEPARTMENT OF HUMAN SERVICES, CLAIM #20-1, AND THE
MICHIGAN DEPARTMENT OF EDUCATION, CLAIM #21-1**

NOW COMES the Chapter 13 Trustee, Krispen S. Carroll, and objects to the debtor's motion as follows:

1. Trustee objects to entry of the order for payment of the late filed State of Michigan priority claims as based upon Trustee's calculation, the addition of these late filed claims will cause debtor's Plan to run 100 months. Based upon Trustee's calculation, debtor's Plan payment would have to be increased from \$350.42 per month to \$918.72 per month.
2. Trustee objects to debtor's failure to disclose to all creditors the significant impact these added claims will have on the feasibility of debtor's Plan.
3. Trustee objects to debtor's failure to file a Plan modification to address the addition of these claims as proposed in the motion.
4. Trustee objects as the originally confirmed Plan required 100% income tax refunds during the life of the Plan; however, at this time no income tax refunds have been received from the debtor, nor have any returns been received from the debtor showing liabilities. Trustee requires a copy of the 2011 and 2013 income tax returns.
5. Trustee objects to debtor's failure to remit her 2012 tax refund in the amount of \$1,185.00.
6. In light of the payment increase necessary to fund the Plan with the addition of these claims, Trustee requests that in addition to the Plan modification that debtor file amended Schedules I and J as required by E. D. Mich. LBR 3015-2 and provide the Trustee with current income verification to determine the ongoing feasibility of debtor's Plan.

WHEREFORE, the Chapter 13 Trustee prays this Honorable Court deny the relief requested.

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT
Krispen S. Carroll, Chapter 13 Trustee

August 7, 2014

/s/ Margaret Conti Schmidt
KRISPEN S. CARROLL (P49817)
MARGARET CONTI SCHMIDT (P42945)
MARIA GOTSIS (P67107)
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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed **TRUSTEE'S OBJECTION TO DEBTOR'S MOTION TO ALLOW ENTRY OF ORDER AUTHORIZING THE TRUSTEE TO PAY LATE-FILED CLAIMS FILED BY THE MICHIGAN DEPARTMENT OF HUMAN SERVICES, CLAIM #20-1, AND THE MICHIGAN DEPARTMENT OF EDUCATION, CLAIM #21-1** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

KOSTOPOULOS & ASSOCIATES
THE FRESH START CENTER PLLC
30800 VAN DYKE STE 204
WARREN, MI 48093-0000

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

TAMMARAWA WRIGHT LEVERETT
18205 LINCOLN DRIVE
SOUTHFIELD, MI 48076-4559

August 8, 2014

/s/ Barbara A. Ecclestone
Barbara A. Ecclestone
For the Office of the Chapter 13 Trustee-Detroit
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